

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Telecom Business Solution, LLC, *et al.*,

Petitioners,

v.

Terra Towers Corp., *et al.*,

Respondents.

Civil Action No.: 1:22-cv-01761

Judge Lewis A. Kaplan

Magistrate Judge Robert W.
Lehrburger

**NOTICE OF MOTION FOR RECONSIDERATION OF, OR ALTERNATIVELY,
FOR RELIEF FROM APRIL 22, 2025 MEMORANDUM OPINION [DE 295]**

PLEASE TAKE NOTICE that, upon the accompanying Motion for Reconsideration and the supporting (i) Memorandum of Law dated May 19, 2025 and (ii) the Declarations of Magali Merino Ascarrunz, and Alejandro Garzaro Perez, dated May 19, 2025, and exhibits thereto, as well as the Court’s May 14, 2025 extension order (ECF No. 316), non-parties—Telecom Business Solution S.R.L., Continental Towers Peru, S.R.L., Collocation Technologies Peru, S.R.L., Magali Merino Ascarrunz, and Alejandro Garzaro Perez (the “Peru Non-Parties”)—by and through their undersigned counsel, hereby move this Court for an order pursuant to Local Civil Rule 6.3 and Rules 59 and 60(b) of the Federal Rules of Civil Procedure, for reconsideration of, or in the alternative, for relief from, the Court’s *Memorandum Opinion Granting Anti-Suit Injunction and Coercive Civil Contempt Remedies* (ECF No. 295), which was entered on April 22, 2025.

Dated: May 19, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on May 19, 2025.

Notice of this filing will be sent to all counsel of record through the Court's electronic notice system.

/s/ Eduardo De la Peña Bernal